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HONORABLE MARSHALL FERGUSON

KING COUNTY
Trial Date: February 10, 2020
SUPERIOR COURT CLERK

E-FILED

CASE NUMBER: 18-2-20955-2 SEA

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

WILLIAM R. CLAYTON and JILL D.
CLAYTON, husband and wife,

Plaintiffs,

v.

IMO INDUSTRIES, INC., individually and as
successor-in-interest to DE LAVAL
TURBINE, INC.;
METALCLAD INSULATION LLC;
METROPOLITAN LIFE INSURANCE
COMPANY;
NORTH COAST ELECTRIC COMPANY;
SYD CARPENTER, MARINE
CONTRACTOR, INC.; and
COPE-S-VULCAN, INC.,

Defendants.

NO. 18-2-20955-2 SEA

FIRST AMENDED COMPLAINT FOR
PERSONAL INJURIES

I. PARTIES

Plaintiffs William R. Clayton and Jill D. Clayton, husband and wife, reside in Maple Valley, Washington.

Defendants and/or their predecessors-in-interest are corporations who, at all times relevant herein, manufactured, sold, distributed, purchased, or maintained on their premises asbestos-containing products or products that were used in conjunction with asbestos.

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II. JURISDICTION

This Court has jurisdiction over this cause pursuant to RCW 4.12.025 because, at all times relevant herein, defendants transacted business and/or may be served with process in King County, Washington. This Court has specific jurisdiction over all nonresident defendant named in this cause because each nonresident defendant purposefully performed acts or consummated transactions in Washington state; Plaintiffs' cause of action arises out of and/or relates to defendants' activities and/or transactions in Washington; and assumption of jurisdiction by this Court does not offend traditional notions of fair play and substantial justice.

III. FACTS

Plaintiff William R. Clayton (DOB: October 16, 1952) was exposed to asbestos and asbestos-containing products that had been mined, manufactured, produced, and/or placed into the stream of commerce by the defendants. As a direct and proximate result of this exposure, plaintiff William R. Clayton developed mesothelioma. Plaintiffs provide the following information:

- A. Specific Disease: Mesothelioma
- B. Date of Diagnosis: June 2016
- C. Military: U.S. Navy, 1971 to 1973
- D. Occupation: Batch man operator; Engineer
- E. Places of Exposure: US Navy aboard the USS Badger (FF-1071)
- F. Dates of Exposure: 1970's
- G. Current Address: 26803 SE 200th Street
Maple Valley, WA 98038

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1 5. For such other relief as the Court deems just.

2 DATED this 12th day of September, 2018.

3 BERGMAN DRAPER OSLUND, PLLC

4 By /s/ Ruby K. Aliment

5 Ruby K. Aliment, WSBA #51242

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